UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

CROGA INNOVATIONS LTD.,

Case No. 2:24-cv-00065-JRG (Lead Case)

Plaintiff,

JURY TRIAL DEMANDED

CISCO SYSTEMS, INC.,

v.

Defendant.

CROGA INNOVATIONS LTD.,

Case No. 2:24-cv-00206-JRG (Member Case)

Plaintiff,

v.

FORTINET, INC.,

Defendant.

CROGA INNOVATIONS LTD.,

Plaintiff,

v.

PALO ALTO NETWORKS, INC.,

Defendant.

Case No. 2:24-cv-00208-JRG (Member Case)

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiff Croga Innovations Ltd. and Defendants Cisco Systems, Inc., Fortinet, Inc., Palo Alto Networks, Inc., respectfully submit the attached proposed Protective Order for the Court's consideration and approval.

Dated: June 28, 2024 Respectfully submitted,

By: /s/ Brett E. Cooper

Brett E. Cooper (NY SBN 4011011)

bcooper@bclgpc.com

Seth Hasenour (TX SBN 24059910)

shasenour@bclgpc.com

Drew B. Hollander (NY SBN 5378096)

dhollander@bclgpc.com

Jonathan Yim (NY SBN 5324967)

jyim@bclgpc.com

BC LAW GROUP, P.C.

200 Madison Avenue, 24^h Floor

New York, NY 10016 Telephone: (212) 951-0100

Attorneys for Plaintiff Croga Innovations Limited

By: /s/ Kyle Petrie

Melissa R. Smith

State Bar No. 24001351

GILLAM & SMITH, LLP

303 South Washington Avenue

Marshall, TX 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

Email: melissa@gillamsmithlaw.com

Kerri-Ann Limbeek (pro hac vice pending)

NY SBN 5211081

klimbeek@desmaraisllp.com

Tamir Packin (pro hac vice pending)

NY SBN 4546685

tpackin@desmaraisllp.com

Leslie Spencer (pro hac vice pending)

NY SBN 3927050

<u>lspencer@desmaraisllp.com</u>

Kyle Petrie (pro hac vice pending)

NY SBN 5527072

kpetrie@desmaraisllp.com

Ryan Thorne (pro hac vice pending)

NY SBN 5656954

rthorne@desmaraisllp.com

DESMARAIS LLP

230 Park Avenue

New York, NY 10169

Telephone: (212) 351-3400

Facsimile: (212) 351-3401

Emily Weber (pro hac vice pending)

CA SBN 348798

eweber@desmaraisllp.com

DESMARAIS LLP

230 Park Avenue

New York, NY 10169

Telephone: (415) 573-1900 Facsimile: (415) 573-1901

Ryan J. Marton (CA 223979)

ryan@martonribera.com

Hector J. Ribera (CA 221511)

hector@martonribera.com

Phillip J. Haack (CA 262060)

phaack@martonribera.com

MARTON RIBERA SCHUMANN & CHANG LLP

548 Market Street, Suite 36117 San Francisco, CA 94104

Counsel for Defendant Cisco Systems, Inc.

By: /s/ Brianna Vinci

Melissa R. Smith

State Bar No. 24001351

GILLAM & SMITH, LLP

303 South Washington Avenue

Marshall, TX 75670

Telephone: (903) 934-8450 Facsimile: (903) 934-9257

Email: melissa@gillamsmithlaw.com

Matthew C. Gaudet

mcgaudet@duanemorris.com

David C. Dotson

dcdotson@duanemorris.com

Alice E. Snedeker

aesnedeker@duanemorris.com

DUANE MORRIS LLP

1075 Peachtree Street, N.E., Suite 1700

Atlanta, Georgia 30309-3929 Telephone: 404.253.6900 Brianna Vinci bvinci@duanemorris.com

DUANE MORRIS LLP

30 South 17th Street Philadelphia, Pennsylvania 19103

Telephone: 215.979.1000 Facsimile: 215.979.1020

Counsel for Defendant Fortinet, Inc.

By: /s/ Betty Chen
Gabrielle E. Higgins
ghiggins@desmaraisllp.com
Betty H. Chen (24056720)
bchen@desmaraisllp.com
DESMARAIS LLP

101 California Street, Suite 3000 San Francisco, CA 94111 Telephone: (415) 573-1900

Facsimile: (415) 573-1901

Melissa R. Smith
State Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue

Marshall, TX 75670

Telephone: (903) 934-8450 Facsimile: (903) 934-9257

Email: melissa@gillamsmithlaw.com

Counsel for Defendant Palo Alto Networks, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

_/s/ Brett E. Cooper
Brett Cooper

CERTIFICATE OF CONFERENCE

The undersigned herby certifies that counsel for Parties complied with the meet and confer requirement in Local Rule CV-7(h) on June 28, 2024, and the Parties are in agreement as to this Motion's substance, as indicated by the signatures of counsel for all Parties.

<u>/s/ Brett E. Cooper</u>
Brett Cooper